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On the ground – and at the table.

January 16th, 2015.

Comments from the New York City Environmental Justice Alliance (NYC-EJA) on the City of New York Action Plan Amendment 8 for Community Development Block Grant – Disaster Recovery (CDBG-DR) funds, Disaster Relief Appropriations Act of 2013.

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit city-wide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens through campaigns designed to affect public policies -- where post-Superstorm Sandy recovery and resiliency building efforts that address the existing vulnerabilities of environmental justice communities is central to our agenda.

Following Superstorm Sandy, NYC-EJA co-convened and facilitated the Sandy Regional Assembly (SRA), a coalition of community, environmental justice, labor, and civic groups from communities impacted by Superstorm Sandy, as well as communities vulnerable to future weather events. Nearly 200 people of all ages from across the NY-NJ region participated in a community-driven conversation to assess the aftermath of Sandy in January 2013. In collaboration with the SRA Planning Committee, NYC-EJA published the Sandy Regional Assembly *Recovery Agenda* in April 2013. Following its release, the SRA Recovery Agenda was shared with Mayor Bloomberg's Office, the Special Initiative for Rebuilding and Resiliency (SIRR), NYC Council, and the federal Hurricane Sandy Rebuilding Task Force.

The New York City Environmental Justice Alliance and our member organizations, such as THE POINT CDC, have been working to promote climate adaptation and resiliency in Hunts Point and other neighborhoods in the South Bronx that are impacted by disproportionate environmental burdens. *Hunts Point Lifelines*, winner of the *Rebuild by Design* competition sponsored by the U.S. Department of Housing and Urban Development, has successfully created a planning framework to address issues of equity in its approach to reduce neighborhood vulnerability -- while working in partnership with South Bronx communities. With the City's commitment to leverage the original investment, the communities that live and work in the South Bronx are taking an important step toward a more sustainable and resilient industrial waterfront.

We appreciate the opportunity to submit comments to the City's Action Plan Amendment 8, and would hereby like to suggest the following recommendations:

- 1. Improve the current system to notify and explain proposed Action Plan amendments to the general public, and enhance opportunities for public input at hearings.**
 - Consider the creation of friendlier materials describing the proposed modifications, and make them available as soon as the amendment is released -- with written notice to all participants who have previously submitted public comments.
 - The current system to receive public input should include opportunities to voice comments/questions orally at the hearings, and receive a public response there.
 - The Action Plan should describe what are the opportunities created for the community to exercise public oversight going forward, including further detail on the quality of the jobs created and the extent of any local hiring.

- 2. Commit to advancing climate adaptation and resiliency building, while responding to locally established community priorities.**
 - The City should commit to local priorities included in the *Rebuild by Design* winning proposals. In the case of *Hunts Point Lifelines*, the Action Plan should be intentional in its commitment to mitigate climate change impacts while addressing environmental justice, and engaging local residents & businesses in planning /implementing all climate adaptation efforts.
 - CDBG-DR resources should not be invested on projects that can generate environmental inequities in other areas. For example, the current Action Plan does not address concerns that a wetlands mitigation bank to finance ecological restoration in the Saw Mill Creek Marsh in Staten Island can enable development in other flood-prone areas of the city -- or encourage high-end residential or commercial development that will result in gentrification-driven displacement pressures.

- 3. Create a robust community engagement process to guarantee inclusive decision-making and transparent implementation.**
 - The Action Plan should explicitly recognize key stakeholders that have been involved in the creation of *Rebuild by Design* winning proposals. In the case of *Hunts Point Lifelines*, the list should include THE POINT CDC and describe the system created to engage the local coalition that has been created there.
 - The Action Plan should be explicit regarding the decision making process created to define the extent and location of the pilot project announced by HUD, the inter-agency strategy for its implementation, and plans to leverage additional funding beyond the \$45M total allocation.

Thank you very much for considering our comments. We look forward to discussing any opportunities to address these concerns.

Sincerely,



Juan Camilo Osorio
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New York City Environmental Justice Alliance